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September 18, 2003

FILED ELECTRONICALLY VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *In re Global Crossing Ltd., et al.*, IB Docket No. 02-286

Dear Ms. Dortch:

Global Crossing Ltd. ("GCL") and GC Acquisition Limited ("New GX" and, together with GCL, "Applicants") submit this letter to advise the Commission of three minor revisions to the ownership and organizational charts submitted with Applicant's Application for Consent to Transfer Control and Petition for Declaratory Ruling.

First, Exhibit 4 to the Fourth Amendment, which contained an organizational chart for GCL's common carrier radio licensees, implied that Global Crossing Ventures, Inc. ("GC Ventures") would own 86.7% of Equal Access Networks, LLC ("EAN") following consummation of the Amended Transaction. As stated in the body of the Fourth Amendment, GC Ventures will own 100% of EAN following consummation of the Amended Transaction.

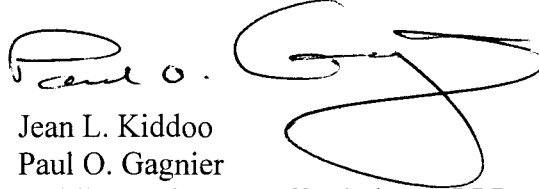
Second, GCL recently formed GC Holdings Limited ("GC Holdings"), a Bermuda company, as a wholly-owned subsidiary of New GX. GC Holdings is a holding company that is not expected to engage in commercial operations. Following consummation of the Amended Transaction, GC Holdings will be an indirect, intermediate parent company of GCL's FCC-licensed subsidiaries.

Third, as Applicants have previously advised, Singapore Technologies Telemedia Pte Ltd ("ST Telemedia") intends to invest in New GX through a Mauritius subsidiary. ST Telemedia has now identified that subsidiary as STT Crossing Ltd.

Ms. Marlene H. Dortch
September 18, 2003
Page 2

Attached are updated versions of the ownership and organizational charts that Applicants have previously submitted to the Commission reflecting these minor changes. Please contact the undersigned if you have any questions about the charts or the matters discussed in this letter

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Paul O. Gagnier", with a large, stylized flourish extending from the end of the name.

Jean L. Kiddoo
Paul O. Gagnier
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007

Counsel for Global Crossing Ltd.
and GC Acquisition Limited

Attachments

cc: Paul Kouroupas (Global Crossing)
Teresa Baer (Latham & Watkins)
Attached Service List

OWNERSHIP INFORMATION

The charts below provide the name, business address, and principal place of business for each of GCL's FCC-licensed subsidiaries and their direct and indirect parent companies. Ownership interests are 100% unless otherwise indicated.

A. GCL's FCC-Licensed Subsidiaries

Global Crossing Entity	Business Address	Principal Place of Business	Ownership Interest in Next Tier Company
Budget Call Long Distance, Inc. ("Budget Call")	1080 Pittsford-Victor Road Pittsford, NY 14534	United States	Not applicable
Equal Access Networks, LLC ("EAN")	1080 Pittsford-Victor Road Pittsford, NY 14534	United States	Not applicable
Global Crossing Bandwidth, Inc. ("GC Bandwidth")	1080 Pittsford-Victor Road Pittsford, NY 14534	United States	Not applicable
Global Crossing Government Markets USA, Inc. ("GC Government Markets")	1080 Pittsford-Victor Road Pittsford, NY 14534	United States	Not applicable
Global Crossing Holdings USA, Inc. ("GC Holdings USA")	1080 Pittsford-Victor Road Pittsford, NY 14534	United States	Owns 100% controlling interest in GC Pacific Landing Corp., GT Landing Corp., MAC Landing Corp., and PAC Landing Corp.
Global Crossing Latin America & Caribbean Co. ("GCLAC")	200 Park Avenue, 3rd Floor Florham Park, NJ 07932	United States	Not applicable
Global Crossing Local Services, Inc. ("GCLS")	200 Park Avenue, 3rd Floor Florham Park, NJ 07932	United States	Not applicable
Global Crossing North American Networks, Inc. ("GCNAN")	200 Park Avenue, 3rd Floor Florham Park, NJ 07932	United States	Owns 100% controlling interest in Budget Call
Global Crossing Telecommunications, Inc. ("GCTI")	1080 Pittsford-Victor Road Pittsford, NY 14534	United States	Owns 100% controlling interest in GC Government Markets and 50% interest in International Optical Networks, LLC
GC Pacific Landing Corp.	200 Park Avenue, 3rd Floor Florham Park, NJ 07932	United States	Not applicable
GT Landing Corp.	200 Park Avenue, 3rd Floor Florham Park, NJ 07932	United States	Not applicable

Global Crossing Entity	Business Address	Principal Place of Business	Ownership Interest in Next Tier Company
GT Landing II Corp.	200 Park Avenue, 3rd Floor Florham Park, NJ 07932	United States	Not applicable
International Optical Networks, LLC (“ION”)	60 Hudson Street New York, NY 10013	United States	Not applicable
MAC Landing Corp.	200 Park Avenue, 3rd Floor Florham Park, NJ 07932	United States	Not applicable
PAC Landing Corp.	200 Park Avenue, 3rd Floor Florham Park, NJ 07932	United States	Not applicable
PC Landing Corp.	See Section C	See Section C	See Section C
Racal Telecommunications Inc. (“Racal”)	60 Hudson Street New York, NY 10013	United States	Owens 50% interest in ION

B. Direct and Indirect Parents of GCL’s FCC-Licensed Subsidiaries

Global Crossing Entity	Business Address	Principal Place of Business	Ownership Interest in Next Tier Company
Global Crossing Ventures, Inc. (“GC Ventures”)	200 Park Avenue, 3rd Floor Florham Park, NJ 07932	United States	Will own 100% controlling interest in EAN ¹
Global Crossing Global Center Holdings, Inc. (“GC GlobalCenter”)	200 Park Avenue, 3rd Floor Florham Park, NJ 07932	United States	Owens 100% controlling interest in GC Ventures
ALC Communications Corporation (“ACL”)	PNC Bank Building Suite 300 300 Delaware Avenue Wilmington, DE 19801	United States	Owens 100% controlling interest in GC Bandwidth, GCLS, GCNAN, GCTI, and GC GlobalCenter
Global Crossing North America, Inc. (“GCNA”)	1080 Pittsford-Victor Road Pittsford, NY 14534	United States	Owens 100% controlling interest in ALC and GT Landing II Corp.
Global Crossing North American Holdings, Inc. (“GCNA Holdings”)	1080 Pittsford-Victor Road Pittsford, NY 14534	United States	Owens 100% controlling interest in GCNA, GC Holdings USA, and GCLAC
Global Crossing (Bidco) Limited (“GC Bidco”)	Centennium House 100 Lower Thames Street London EC3R 6DL United Kingdom	United Kingdom	Owens 100% controlling interest in Racal

¹ GC Ventures currently holds an 86.7% controlling interest in EAN. Douglas Norton and Daniel Kelly each currently hold a 6.65% interest in EAN. The interests of Messrs. Norton and Kelly will be eliminated in connection with GCL’s restructuring.

Global Crossing Entity	Business Address	Principal Place of Business	Ownership Interest in Next Tier Company
Global Crossing (Holdco) Limited (“GC Holdco”)	Centennium House 100 Lower Thames Street London EC3R 6DL United Kingdom	United Kingdom	Owns 100% controlling interest in GC Bidco
Global Crossing Intermediate UK Holdings Ltd. (“GC UK Holdings”)	Centennium House 100 Lower Thames Street London EC3R 6DL United Kingdom	United Kingdom	Owns 100% controlling interest in GC Holdco
Global Crossing Asia Holdings Ltd. (“GC Asia Holdings”)	See Section C	See Section C	See Section C
GC Holdings Limited (“GC Holdings”)	Wessex House 1 st Floor, 45 Reid Street Hamilton HM 12, Bermuda	United States or Bermuda	GC Holdings will own 100% controlling interests in GC Asia Holdings, GCNA Holdings, and GC UK Holdings ²
GC Acquisition Limited	Wessex House 1 st Floor, 45 Reid Street Hamilton HM 12, Bermuda	United States or Bermuda	New GX will own 100% controlling interest in GC Holdings

C. Asia Global Crossing Companies

Asia Global Crossing Entity	Business Address	Principal Place of Business	Ownership Interest in Next Tier Company
PC Landing Corp. (“PC Landing”)	11150 Santa Monica Blvd. Suite 400 Los Angeles, CA 90025	United States	Not applicable
Pacific Crossing UK Ltd. (“PCUK”)	Centennium House 100 Lower Thames Street London EC3R 6DL United Kingdom	United Kingdom	Owns 100% controlling interest in PC Landing
Pacific Crossing Ltd. (“PCL”)	Mintflower Place 2nd Floor, 8 Par-la-Ville Rd. Hamilton HM08, Bermuda	Bermuda	Owns 100% controlling interest in PCUK
Vectant, Inc.	111 West 57 th Street Suite 1000 New York, NY 10019	Japan	Owns 15.5% non-controlling interest in PCL

² Those interests are currently held by Global Crossing Holdings Ltd., a Bermuda holding company that is wholly owned by GCL.

Asia Global Crossing Entity	Business Address	Principal Place of Business	Ownership Interest in Next Tier Company
SCS (Bermuda) Ltd.	Mintflower Place 2nd Floor, 8 Par-la-Ville Rd. Hamilton HM08, Bermuda	Bermuda	Owns 14.5% interest in PCL
GCT Pacific Holdings Ltd. (“GCT Pacific”) ³	Mintflower Place 2nd Floor, 8 Par-la-Ville Rd. Hamilton HM08, Bermuda	Bermuda	Owns 70% interest in PCL and 100% controlling interest in SCS (Bermuda) Ltd.
Asia Global Crossing Ltd. (“AGCL”)	Mintflower Place 2nd Floor, 8 Par-la-Ville Rd. Hamilton HM08, Bermuda	Hong Kong	Owns 100% controlling interest in GCT Pacific
Microsoft Corporation	One Microsoft Way Redmond, WA 98052	United States	Owns 14.7% non-controlling interest in AGCL
Softbank Corp.	Kakigaracho Chiba Bldg., Nihonbashi-Kakigaracho 1-36-37 Chuo-ku Tokyo, Japan	Japan	Owns 14.6% non-controlling interest in AGCL (through two intermediate holding companies)
Public and Others (including AGCL management)	Various	Various	Own 11.7% non-controlling interest in AGCL
Global Crossing Asia Holdings Ltd.	Wessex House 1 st Floor, 45 Reid Street Hamilton HM 12, Bermuda	Bermuda	Owns 54.2% interest in Asia Global Crossing Ltd. ⁴

³ GCT Pacific and SCS (Bermuda) Ltd. together own an 84.5% controlling interest in PCL.

⁴ In addition to the 54.2% interest in Asia Global Crossing Ltd. (“AGCL”) that is held by Global Crossing Asia Holdings Ltd., GCL currently has a direct 1.2% interest in AGCL and an indirect 3.5% interest that is held through two of GCL’s Delaware subsidiaries: IXnet, Inc. (0.3%) and International Exchange Networks Ltd. (3.2%). GCL’s current total ownership interest in AGCL is 58.9%.

D. Singapore Technologies Telemedia Pte Ltd and Its Affiliates

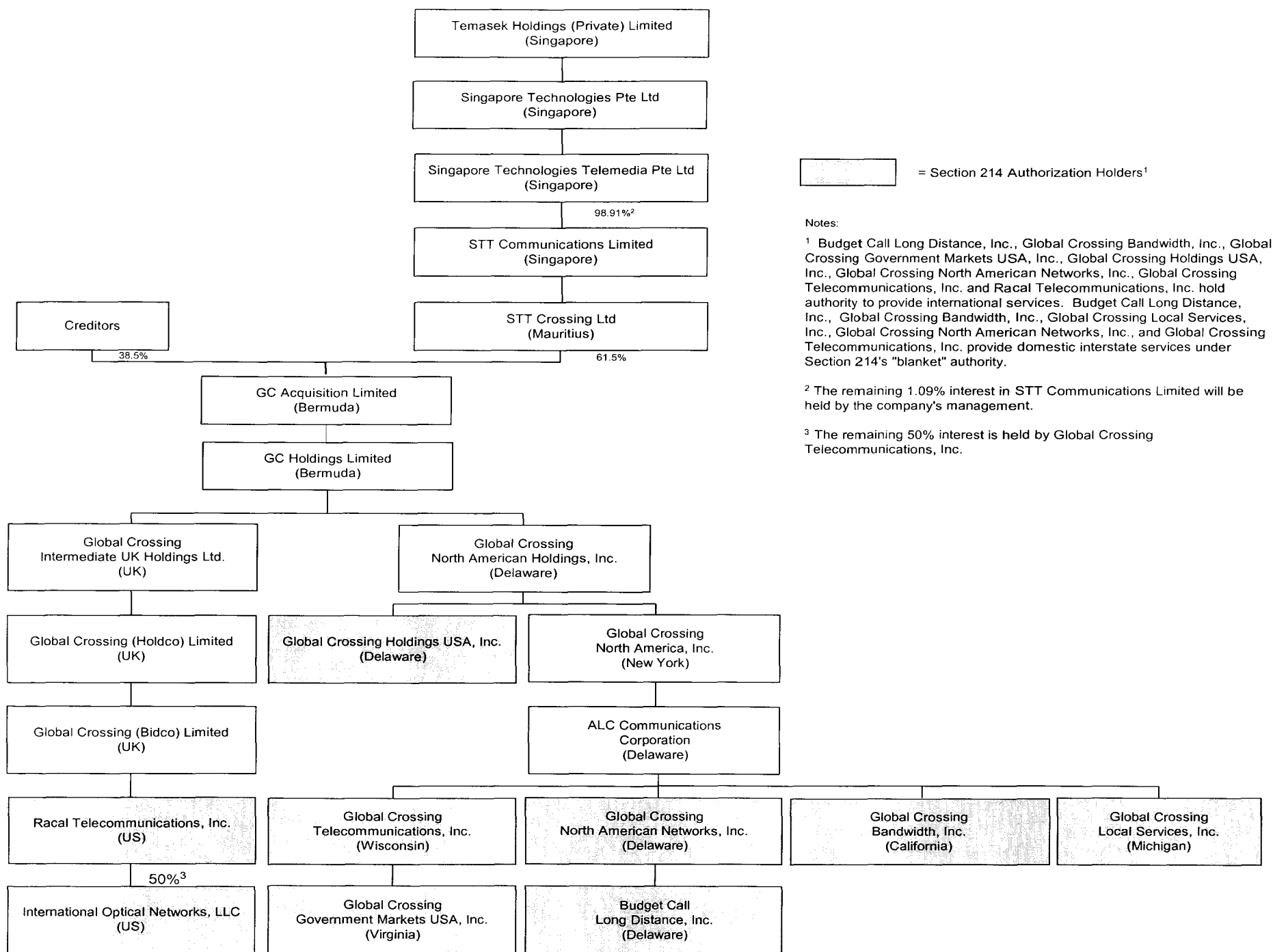
Entity	Business Address	Principal Place of Business	Ownership Interest in Next Tier Company
STT Crossing Ltd (“STT Crossing”) ⁵	10 Frere Felix de Valois Street Port Louis, Mauritius	Mauritius, Singapore, or United States	Will own 61.5% controlling interest in New GX
STT Communications Limited	51, Cuppage Road #10-11/17, StarHub Centre Singapore 229469	Singapore	Will own 100% controlling interest in STT Crossing
Singapore Technologies Telemedia Pte Ltd (“ST Telemedia”)	51, Cuppage Road #10-11/17, StarHub Centre Singapore 229469	Singapore	Owens 98.91% controlling interest in STT Communications Limited ⁶
Singapore Technologies Pte Ltd	51, Cuppage Road #09-01 StarHub Centre Singapore 229469	Singapore	Owens 100% controlling interest in ST Telemedia
Temasek Holdings (Private) Limited	60B Orchard Road, #6-18 Tower 2, The Atrium@Orchard, Singapore 238891	Singapore	Owens 100% controlling interest in Singapore Technologies Pte Ltd

⁵ STT Crossing is an investment holding company formed by ST Telemedia's subsidiary, STT Communications Limited, for the purpose of holding ST Telemedia's investment in New GX. It is unclear if STT Crossing's principal place of business for the Commission's purposes would be considered to be Mauritius, Singapore or the United States. STT Crossing's headquarters is located in Mauritius, and its directors are nationals of Mauritius; it currently has no officers. STT Crossing currently has no assets, and it expects that its only asset upon consummation of the Amended Transaction will be its interest in New GX. STT Crossing expects its revenue to be derived from that investment. Accordingly, Applicants submit that the Commission should find that STT Crossing's principal place of business is in Mauritius, Singapore, or the United States, all of which are members of the World Trade Organization.

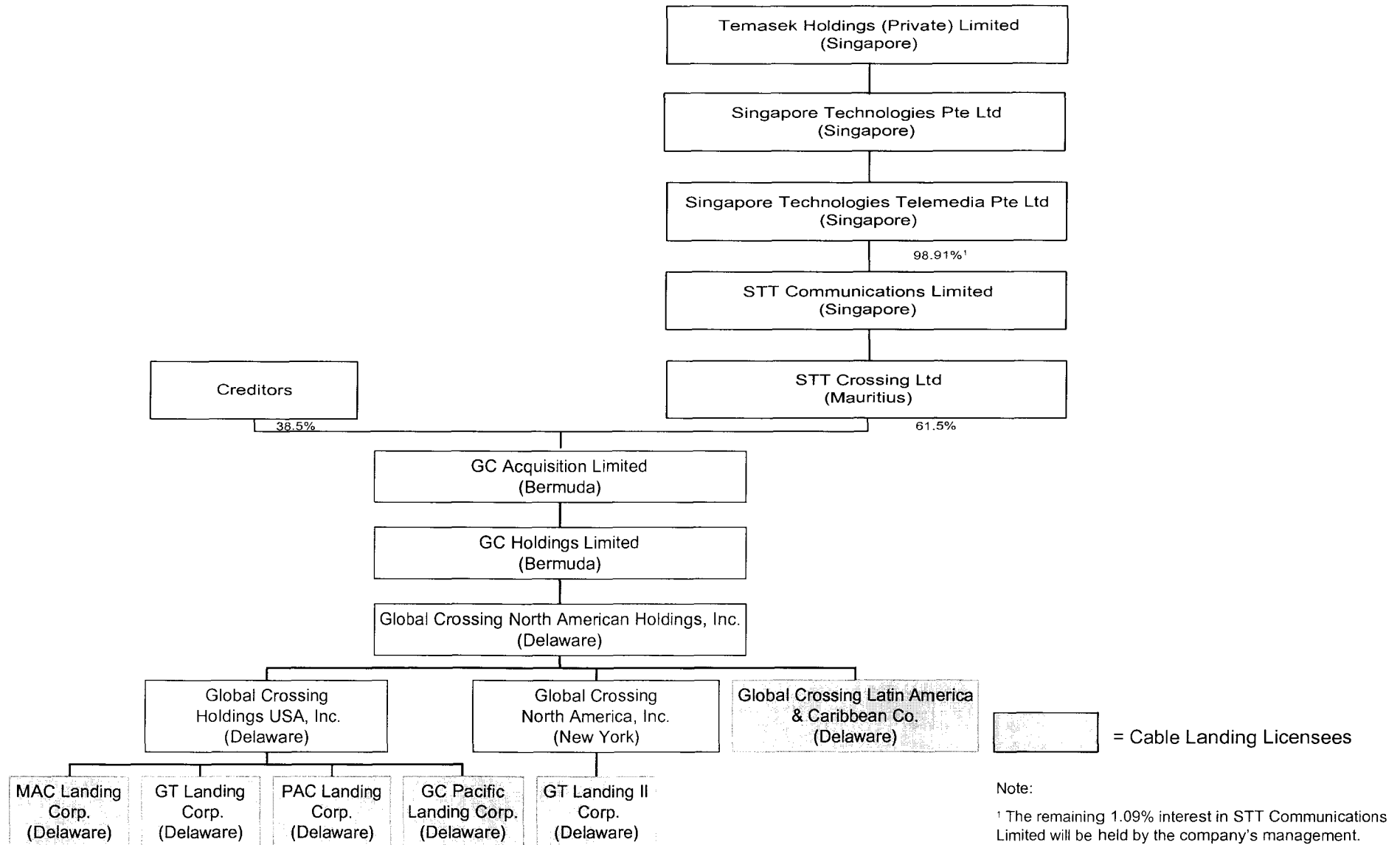
⁶ The 1.09% interest in STT Communications Limited that is not owned by ST Telemedia is held by 20 participants under the management buy-in share incentive program of STT Communications Limited. Of the 20 participants, 19 are Singapore nationals and one is a national of the United Kingdom who is a permanent resident of Singapore.

**ORGANIZATIONAL CHARTS FOR GCL'S
FCC-LICENSED SUBSIDIARIES**

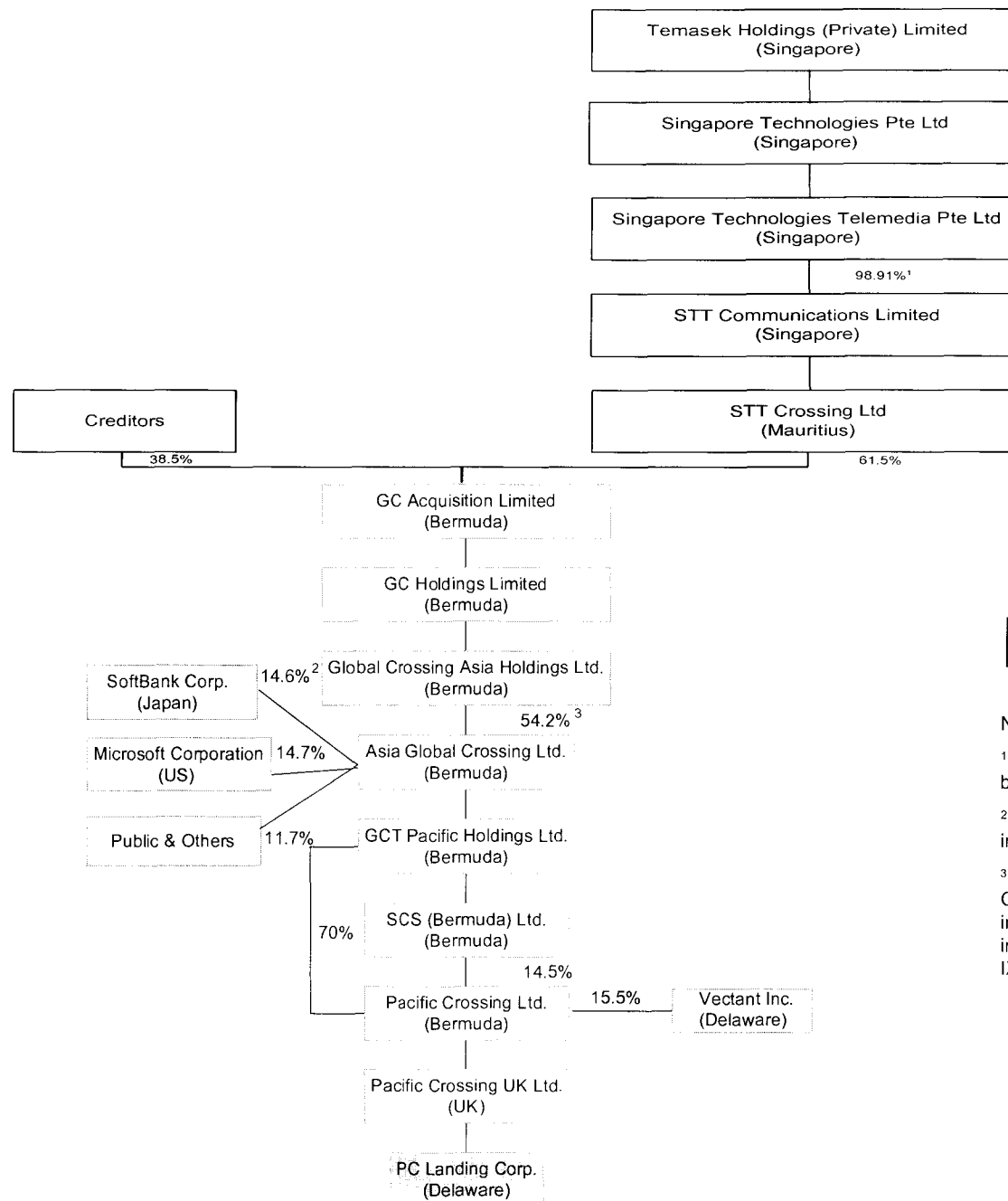
Post-Closing Ownership Structure of Holders of Domestic and International Section 214 Authorizations



Post-Closing Ownership Structure of Cable Landing Licensees (Except PC Landing Corp.)



Post-Closing Ownership Structure of PC Landing Corp.



= Cable Landing Licensee

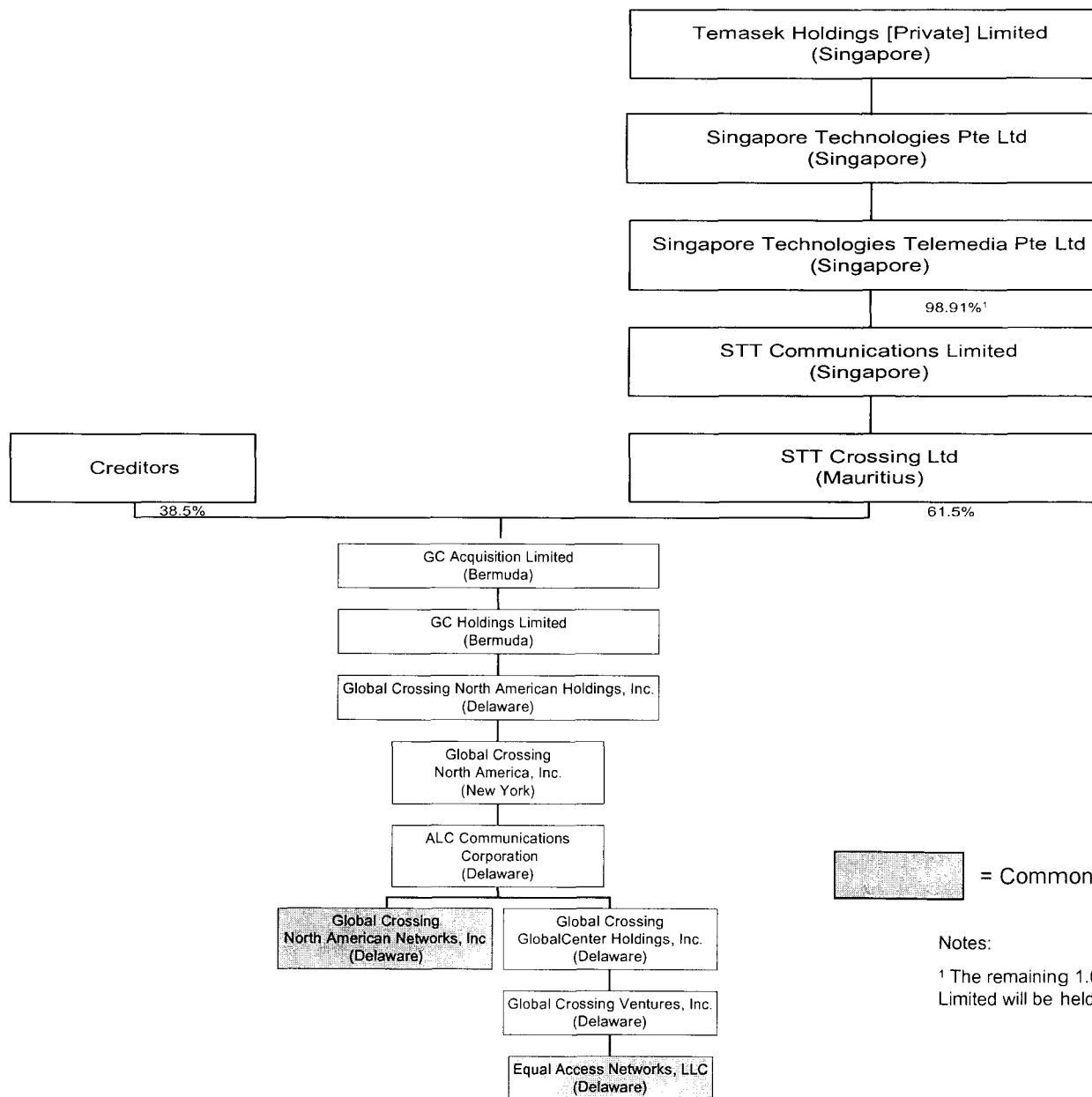
Notes:


¹ The remaining 1.09% interest in STT Communications Limited will be held by the company's management.

² Softbank Corp.'s stake in AGCL is held through two wholly-owned intermediate holding companies.

³ In addition to New GX's 54.2% interest to be held through Global Crossing Asia Holdings, Ltd., New GX will hold a 1.2% direct interest in Asia Global Crossing Limited and will hold indirect interests through two of its wholly-owned Delaware subsidiaries: IXNet, Inc. (0.3%) and International Exchange Networks Ltd. (3.2%).

Post-Closing Ownership Structure of Common Carrier Radio Licensees



 = Common Carrier Radio Licensees

Notes:

¹ The remaining 1.09% interest in STT Communications Limited will be held by the company's management.

CERTIFICATE OF SERVICE

I, Ivonne Diaz, hereby certify that on this 18th day of September, 2003, I caused a true and correct copy of the foregoing letter to be served upon the following parties in the manner indicated:

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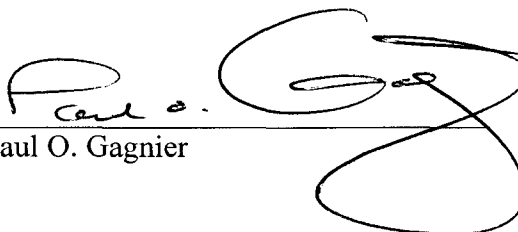
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